Motion Granted.

/s/ John R. Adams

U.S. District Judge
July 14, 2022

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

KATHY LAWHEAD)
Plaintiff,) CASE NO. 5:22-cv-00886-JRA
v. BROOKWOOD MANAGEMENT)) JUDGE JOHN R. ADAMS
COMPANY, LLC) DEFENDANT'S MOTION FOR
Defendant.) LEAVE TO PLEAD
)

Defendant, Brookwood Management Company, LLC, by and through the undersigned counsel, respectfully moves this Court for an additional fourteen (14) days in which to answer or otherwise respond to Plaintiff's Complaint.

For cause, the undersigned states that he was only recently retained and requires additional time to adequately investigate Plaintiff's claim and Defendant's potential counterclaims.¹

The undersigned reached out to Attorney Thomas Renz, counsel for Plaintiff, on July 12, 2022, via telephone and e-mail to notify him of Defendant's intent to request leave to plead and has not received a response as of the date and time of filing this Motion. A proposed Order is attached for the Court's consideration.

Respectfully Submitted,

/s/ Thomas W. Winkhart
Thomas W. Winkhart, Esq. (#0041888)
Kelsey M. Sullivan, Esq. (#0098727)
Winkhart & Minor, LLC

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¹ Defendant expressly reserves all of its Civ. R. 12 defenses.